

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP., SMARTMATIC)
INTERNATIONAL HOLDING B.V. and)
SGO CORPORATION LIMITED,)
)
Plaintiffs,)
)
v.) Case No. 22-cv-00098-JMB-JFD
)
)
MICHAEL J. LINDELL and MY PILLOW, INC.,)
)
Defendants.)

STATEMENT INSTEAD OF REDACTION

The following exhibits to Smartmatic's Memorandum in Support of its Motion to Exclude the Opinion and Testimony of Benjamin Cotton have been filed under seal in accordance with Local Rule 5.6(d) as follows:

Exhibit	Description	Reasons for Filing Under Seal
A	Email between Kachouroff and Frey (Redacted)	Produced in Discovery- Entire Document is labeled as Confidential
B	Smith Depo pages	Produced in Discovery- Entire Document is labeled as Confidential
C	Smartmatic Strategy Briefing	Produced in Discovery- Entire Document is labeled as Confidential
D	Plaintiffs' 6 th Supplemental Responses to Interrogatories	Produced in Discovery- Entire Document is labeled as Confidential
E	Mugica Depo Pages	Produced in Discovery- Entire Document is labeled as Confidential
F	Shelly Depo Pages	Produced in Discovery- Entire Document is labeled as Confidential
G	Request for Proposal	Produced in Discovery- Entire Document is labeled as Confidential
H	Smartmatic Internal Email	Produced in Discovery- Entire Document is labeled as Confidential
I	Smartmatic Lost Opportunity Spreadsheet	Produced in Discovery- Entire Document is labeled as Confidential

J	Appendix A	Produced in Discovery- Entire Document is labeled as Confidential
K	Montgomery Depo 10/9/23	Produced in Discovery- Entire Document is labeled as Confidential
L	Montgomery Depo 2 10/10/23	Produced in Discovery- Entire Document is labeled as Confidential
M	Flynn Depo Pages	Produced in Discovery- Entire Document is labeled as Confidential
N	Frank Depo Pages	Produced in Discovery- Entire Document is labeled as Confidential
O	Depo Lindell Pages	Produced in Discovery- Entire Document is labeled as Confidential
173	Flynn Depo	Produced in Discovery- Entire Document is labeled as Confidential
177	Flynn Depo Email to ML	Produced in Discovery- Entire Document is labeled as Confidential
216	Ed Smith Depo	Produced in Discovery- Entire Document is labeled as Confidential
255	Kevin Shelly Depo	Produced in Discovery- Entire Document is labeled as Confidential
490	Mugica Depo	Produced in Discovery- Entire Document is labeled as Confidential
504	Montgomery Depo	Produced in Discovery- Entire Document is labeled as Confidential
505	Montgomery Depo	Produced in Discovery- Entire Document is labeled as Confidential
516	Montgomery Depo	Produced in Discovery- Entire Document is labeled as Confidential

Signed: November 13, 2024

MCSWEENEY, CYNKAR & KACHOUROFF, PLLC

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*Admitted *Pro Hac Vice*